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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

United States of America,

Plaintiff,

v.

PCPLV LLC d/b/a Pinnacle Compounding Pharmacy, Ofir Ventura, Cecelia Ventura, Brandon Jimenez, Robert Gomez, Gomez & Associates, Inc., Rock'n Rob Enterprises, Amir Shalev, D.P.M., AS Enterprises, Inc., and Ivan Lee Goldsmith, M.D.,

Defendants.

Case No. 2:21-cv-00184-JCM-DJA

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JOINT MOTION FOR EXTENSION OF
TIME
(SECOND REQUEST)

Plaintiff UNITED STATES OF AMERICA and Defendants PCPLV LLC, OFIR VENTURA, CECELIA VENTURA, and BRANDON JIMENEZ (“Defendants”), by and through their counsel, hereby jointly move the Court to extend the time for Defendants to file an answer or other responsive pleading to Plaintiff’s complaint by an additional 21 days. This is the second request to extend this deadline and is based on the following:

1. On October 3, 2023, this Court extended by 60 days, up through and including January 26, 2024, Defendants’ time to file an answer or other responsive pleading to Plaintiff’s complaint. This was the first extension of time of this deadline.

1 2. Plaintiffs and Defendants continue to engage in productive settlement discussions and
2 believe that extending the January 26, 2024 deadline by an additional 21 days, up
3 through and including February 16, 2024, will assist their ongoing settlement
4 discussions.

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6 DATED: January 9, 2024

Respectfully submitted,

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8 BY: /s/ Peter S. Christiansen
9 PETER S. CHRISTIANSEN, ESQ.
10 Attorney for Defendants PCPLV LLC,
11 OFIR VENTURA, and CECELIA VENTURA

12 BY: /s/ Michael V. Cristalli
13 MICHAEL V. CRISTALLI, ESQ.
14 Attorney for Defendant BRANDON JIMENEZ

15 BY: /s/ Summer A. Johnson
16 SUMMER A. JOHNSON
17 Assistant United States Attorney
18 Attorney for Plaintiff UNITED STATES

19 IT IS SO ORDERED:
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21 DANIEL J. ALBREGTS
22 UNITED STATES MAGISTRATE JUDGE

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24 DATED: 1/10/2024
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1 **CERTIFICATE OF SERVICE**

2 Pursuant to FRCP 5, LR IC4-1, and LR 5-1, I hereby certify that I am an employee of Clark
3 Hill PLLC, and that on the 9th day of January 2024, I caused to be served a true and correct copy
4 of the foregoing **JOINT MOTION FOR EXTENSION OF TIME (SECOND REQUEST)** in
5 the following manner:

6 The Court's Electronic Filing System to all parties on the current service list.

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8 */s/ Tanya Bain*
9 An Employee of CLARK HILL PLLC

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